

In the United States District Court
Middle District of Pennsylvania

FILED
HARRISBURG

JUDGE'S COPY

MAY 07 2001

MARY E. D'ANDREA, CLERK
Per. M
DEPUTY CLERK

Douglas Henry Thornton
Plaintiff

v.

Civil No. 1: CV00-1255
Kane, J.

Donald Romine, Warden,
Defendant

Plaintiff Motion of Objection
to Defendant Motion to Dismiss

Comes now the Said Plaintiff, Douglas H. Thornton and motion this Court for leave to file to motion of objection to Defendant Motion to Dismiss this action and to grant the same for the following reasons,

1. Conley v. Gibson, 355 U.S. 41, 45-46 (1957). The material facts in this action are real. Celotex Corp v. Catrett 477 U.S. 317 322. 1986. Anderson v. Liberty Lobby Inc. 477 U.S. 242 248 (1986)
2. The evidence in this case would permit a reasonable jury to find in the Plaintiff Favor on the facts. Laningham v U.S. Navy 813 F2d 1236 1242 DC Cir 1987.
3. On July 18 2000, Plaintiff was transfer from USP-Lewisburg to USP Allenwood, most of his legal property was lost. See Attached Remedies to Complaint etc.

72.

Plaintiff has Attached BOP remedies etc. the Complaint and other such documented evidence in Support to the facts and Subject matter of this action.

4. Id at 255 See also Washington Post Co v. U.S. Dept of health. 865 F2d 320 325 D.C. Cir 1989.

Haines v. Kerner, 404 U.S. 519, 520 1972.

Plaintiff is in pain at the time of writing this motion and he taking medication.

U.S.P. ALLENWOOD PHARMACY (570) 547-0963
PO BOX 3500 - WHITE DEER, PA 17887
11752 J. BENNETT-M 04/09/01
THORNTON, DOUGLAS HEN 37461-118
ALP - A01-116L
TAKE ONE TABLET BY MOUTH TWICE
DAILY FOR 21 DAYS

CIPROFLOXACIN 500 MG TAB [REDACTED]
(0) Refills 04/18/2001 RWS Exp 04/29/01
CAUTION: Federal/State law prohibits transfer of this drug
to any person other than patient for whom prescribed.

U.S.P. ALLENWOOD PHARMACY (570) 547-09
PO BOX 3500 - WHITE DEER, PA 17887
11780 D. INCH 04/10/01
THORNTON, DOUGLAS HENR 37461-118
ALP - A01-116L
TAKE ONE TABLET WITH FOOD THREE
TIMES DAILY AFTER MEALS AS
NEEDED



TAKE WITH
FOOD

NAPROXEN NA 275MG 275MG [REDACTED]
(0) Refill 04/10/2001 RWS RXP 05/09/01
CAUTION: Federal law prohibits transfer of this drug
to any person other than patient for whom prescribed.

U.S.P. ALLENWOOD PHARMACY (570) 547-09
PO BOX 3500 - WHITE DEER, PA 17887
11314 C. FRIMPONG 03/27/01
THORNTON, DOUGLAS HENR 37461-118
ALP - A01-116L
TAKE TWO TABLETS BY MOUTH EVERY
4-6 HOURS AS NEEDED

ACETAMINOPHEN 500MG TAB [REDACTED]
(0) Refill 03/27/2001 RWS RXP 04/25/01
CAUTION: Federal law prohibits transfer of this drug
to any person other than patient for whom prescribed.

Respectfully Submitted
[Signature]
Douglas H. Thornton
Reg No# 37461-118 1A-116
JSP, Allenwood
P.O. Box 3000
White Deer PA 17887

Copies to

Joseph J. Terz
Assistant U.S. Attorney
Michele E. Lincalis
Paralegal / Specialis
316 Federal building
240 West Third St
Williamsport PA 17702

Ap May 2 - 2001

CERTIFICATE OF SERVICE AND PRISONER MAILING

I. Douglas Henry Morantou, being duly sworn according to law, hereby depose and say:

1. I am a prisoner at USP Allenwood, White Deer, PA.

2. On the 2 day of MAY, 2001, I placed One copies of the attached pleading(s)

in an envelope addressed to the following party/parties:

Joseph S. Terz; Assistant U.S. Attorney 316 Federal building
240 West Third St
Williamsport, PA 17403

Motion of objection to Defendant motion to Dis

3. I then affixed sufficient postage to cover first-class U.S. Mail delivery, and placed the package in the box reserved for inmate Legal Mail here at USP Allenwood on May 2, 2001.

SIGN UNDER THE PAIN OF PERJURY ON THIS ~~May~~ 2 DAY OF May, 2001.

ss/

Douglas H. Morantou
Reg. No. 37461-118

USP Allenwood
P.O. Box 3000
White Deer, PA 17887